

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INSTITUTE FOR DISABILITIES
RESEARCH AND TRAINING, INC.

Plaintiff

v.

Case No. 05-176-GMS

WAL-MART STORES, INC.

Defendant

* * * * *

NOTICE OF DEPOSITION

TO: Gregory A. Inskip, Esquire
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, Delaware 19899

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), the undersigned attorney will take the deposition upon oral examination by stenographic means of Wal-Mart Stores, Inc. ("Wal-Mart") through the person or persons most knowledgeable, on March 3, 2006 at the offices of Morris, James, Hitchens & Williams LLP, 222 Delaware Avenue, 10th Floor, Wilmington, Delaware 19801, or on other such date or dates or at other such place agreed upon by counsel for the parties, regarding the following matters:

- (a) The development agreement between the parties that was effective on or about March 28, 2002 (the "Development Agreement"), and any drafts thereof;
- (b) The meaning of the term "CBL modules" as used in the Development Agreement;

- (c) The meaning of the terms “Phase I” and “Phase II” as used in the Development Agreement;
- (d) The meaning of the term “Phase Contract Price” as used in the Development Agreement;
- (e) The Master ASL Timeline;
- (f) The January 23, 2003 final invoice;
- (g) The February 19, 2003 Revised Final Invoice; and
- (h) The reasons for which the February 19, 2003 Revised Final Invoice was not paid by Wal-Mart.

The deposition will continue from day to day, if necessary, during normal working hours, until completed. You are invited to attend and cross-examine.

/s/ Patricia R. Uhlenbrock
Patricia R. Uhlenbrock (#4011)
MORRIS, JAMES, HITCHENS &
WILLIAMS LLP
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Wilmington, Delaware 19801
(302) 888-6800
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Attorneys for Plaintiff

OF COUNSEL:

Harvey Greenberg, Esquire
29 W. Susquehanna Avenue – Suite 700
Towson, MD 21204
(410) 823-2277

Dated: November 29, 2005

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of November, 2005, I electronically filed the foregoing document, **NOTICE OF DEPOSITION**, with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Gregory A. Inskip, Esquire
Potter Anderson & Corroon LLP
1313 North Market Street
P.O. Box 951
Wilmington, DE 19899-0951

/s/ Patricia R. Uhlenbrock
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Attorneys for Plaintiff